

# REQUEST FOR CATEGORICAL EXCLUSION

## ACTIVITY DATA

<b>Activity Name:</b>	Support to Iraq's Electoral Processes-UNAMI
<b>Geographic Location(s)</b> (Country/Region):	Iraq
<b>Amendment</b> (Yes/No), if Yes indicate # (1, 2...):	No
<b>Implementation Start/End Dates</b> (FY or M/D/Y):	01/01/2021-12/31/2023
<b>If Amended, specify New End Date:</b>	
<b>Solicitation/Contract/Award Number(s):</b>	New Award
<b>Implementing Partner(s):</b>	UNDP/UNAMI
<b>Bureau Tracking ID:</b>	ME 21-08
<b>Tracking ID of Related RCE/IEE</b> (if any):	N/A
<b>Tracking ID of Other, Related Analyses:</b>	

## ORGANIZATIONAL/ADMINISTRATIVE DATA

<b>Implementing Operating Unit(s):</b> (e.g. Mission or Bureau or Office)	USAID/Iraq
<b>Other Affected Operating Unit(s):</b>	
<b>Lead BEO Bureau:</b>	Middle East
<b>Funding Operating Unit(s):</b> (e.g. Mission or Bureau or Office)	USAID/Iraq
<b>Funding Account(s)</b> (if available):	
<b>Original Funding Amount:</b>	\$9,700,000
<b>If Amended, specify funding amount:</b>	
<b>If Amended, specify new funding total:</b>	
<b>Prepared by:</b>	Samer Saad
<b>Date Prepared:</b>	11/24/2020

## ENVIRONMENTAL COMPLIANCE REVIEW DATA

<b>Analysis Type:</b>	<input checked="" type="checkbox"/> Request for Categorical Exclusion <input type="checkbox"/> Deferral
<b>Environmental Determination(s):</b>	<input checked="" type="checkbox"/> Categorical Exclusion(s) <input type="checkbox"/> Deferred (per 22 CFR 216.3(a)(7)(iv))
<b>RCE Expiration Date</b> (if applicable):	
<b>Additional Analyses/Reporting Required:</b>	
<b>Climate Risks Identified (#):</b>	Low <u>5</u> Moderate <u>#</u> High <u>#</u>
<b>Climate Risks Addressed (#):</b>	Low <u>5</u> Moderate <u>#</u> High <u>#</u>

## THRESHOLD DETERMINATION AND SUMMARY OF FINDINGS

### ACTIVITY SUMMARY

The activity will be implemented through a cost-type PIO agreement with the United Nations Assistance Mission for Iraq (UNAMI) with the aim of supporting efforts to prepare for the upcoming Iraqi elections. The USAID/Iraq Mission intends to support four activities, distinct from other donors' support. These activities are aimed at providing direct, time-bound assistance and technical support to IHEC to enable it to successfully conduct the parliamentary elections, currently set for June 2021. With USAID's support UNAMI will deploy a team of advisors with electoral expertise to support IHEC with its technical preparations, both at IHEC headquarters and, more significantly, at its governorate offices.

### ENVIRONMENTAL DETERMINATIONS

Upon approval of this document, the following determinations become affirmed, per Agency regulations (22 CFR 216).

**TABLE 1: ENVIRONMENTAL DETERMINATIONS**

Activities	Categorical Exclusion Citation (if applicable)	Deferral <sup>1</sup>
Activity 1: Improve the conduct of key electoral operations for the 2020 Council of Representatives elections	§216.2(c)(2)(i), (iii) & (v)	<input type="checkbox"/>
Sub-activity 1.1: Capacity building for Governorate Electoral Offices (GEOs)	§216.2(c)(2)(i), (iii) & (v)	<input type="checkbox"/>
Sub-activity 1.2: Assistance in the formulation and implementation of election cascade training plans.	§216.2(c)(2)(i), (iii) & (v)	<input type="checkbox"/>
Sub-activity 1.3: Support for the preparation and management of a Results Management System.	§216.2(c)(2)(i), (iii) & (v)	<input type="checkbox"/>
Sub-activity 1.4: Support to IHEC in developing an electoral Code of Conduct for Political Actors.	§216.2(c)(2)(i), (iii) & (v)	<input type="checkbox"/>

### CLIMATE RISK MANAGEMENT

The screening for climate change risk for the above set of activities concluded that all activities are low risk. Nonetheless, the implementing partner is advised to consider the impact of increasing temperatures as well as a higher frequency and/or intensity of extreme events on the vulnerable populations being served under the activity.

<sup>1</sup>

Deferrals must be cleared through an Amendment to this RCE prior to implementation of any deferred activities.


The climate risk screening table is attached as Annex 1.

#### IMPLEMENTATION

In accordance with 22 CFR 216 and Agency policy, the conditions and requirements of this document become mandatory upon approval. This includes the relevant limitations, conditions and requirements in this document as stated in Section 3 of this RCE.

The Implementing Partner must ensure compliance with all host government and USAID requirements for disease prevention and ensure its staff and volunteers receive appropriate and timely guidance and training on the latest mitigation measures to prevent the spread of COVID-19 and other infectious diseases. This includes, but is not limited to proper hygiene, use of masks and gloves, cleaning/disinfecting, and social distancing, as appropriate.

**USAID APPROVAL OF INITIAL ENVIRONMENTAL EXAMINATION****ACTIVITY NAME:** Support to Iraq's Electoral Processes-UNAMI**Bureau Tracking ID:** ME 21-08

<b>Approval:</b>	Cleared / Robert Birkenes for John Cardenas, Mission Director	12/07/2020 Date
Clearance:	Cleared by email Vladan Raznatovic, AOR	12/01/2020 Date
Clearance:	Cleared by email Vladan Raznatovic, Mission Environmental Officer	12/01/2020 Date
Clearance:	Cleared by email Christopher Frey, Regional Environmental Advisor	12/3/2020 Date
Clearance:	Cleared by email Michael Behan, Regional Legal Officer	12/6/2020 Date
Clearance:	Cleared by email Christean Cole, Program Director	12/6/2020 Date
Clearance:	Cleared Robert Birkenes, Deputy Mission Director	12/07/2020 Date
Concurrence:	 Jeffrey Ploetz, ME Bureau Environmental Officer	12/07/2021 Date

**DISTRIBUTION:****Implementing Partner, AOR File, Environmental Compliance Database**

## 1.0 PROJECT AND ACTIVITY DESCRIPTION

### 1.1 PURPOSE OF THE RCE

The purpose of this document is to establish that all proposed activities belong to classes of actions eligible for Categorical Exclusions as set out in Agency regulations (22 CFR 216.2(c)) and that there are no foreseeable significant direct or indirect impacts that would preclude them from receiving a Categorical Exclusion. Upon approval of this document, the Categorical Exclusions are affirmed for the activity. This analysis also documents the results of the activity level Climate Risk Management process in accordance with USAID policy (specifically, ADS 201 mandatory reference 201mal).

This RCE is a critical element of USAID's mandatory environmental review and compliance process meant to achieve environmentally sound activity design and implementation.

### 1.2 ACTIVITY OVERVIEW

The activity will be implemented, in accordance with ADS 308.3.9.1, using a cost-type PIO agreement with UNAMI with the aim of supporting efforts to prepare for the upcoming Iraqi elections. The activity will focus on providing direct, time-bound assistance and technical support to the organization of early parliamentary elections. It entails the deployment of electoral expertise to support technical areas of preparations at the Independent High Electoral Commission (IHEC) headquarters and, more significantly, at governorate offices level.

### 1.3 ACTIVITY DESCRIPTION

Support will be provided to the UNAMI activity plans and will include the following components:

1. Capacity building for Governorate Electoral Offices (GEOs). Under this component, the activity will provide capacity building support to IHEC's Governorate Offices in: planning and coordination of electoral offices duties, training for staff and senior management at IHEC's field offices, and support of public outreach and communication of the Governorate IHEC counterparts on social and other media.
2. Assistance in the formulation and implementation of election cascade training plans. Operational training will be delivered using the "cascade" model, ensuring that there are sufficient skilled trainers available to conduct the training. This follows the training of trainers' model that will enable a sufficient number of skilled trainers to be available to conduct the training.
3. Support for the preparation and management of a Results Management System, especially an audit of the system. Under this component, the activity will provide support for the preparation and management of a Results Management System, recruit ICT advisors and IT officers to work with IHEC ICT counterparts, develop in-house training for IHEC staff on results management, seat allocation and ICT, and provide advisory support to IHEC in procuring and overseeing an independent audit of elections results management system.
4. Code of Conduct for political actors. Support to IHEC to develop an electoral Code of Conduct (in collaboration with UNAMI's Office of Political Affairs) in an effort to minimize intolerance, violence and hate speech during both campaigning and voting periods, political parties and actors will be encouraged publicly to sign up to a code of good electoral conduct.

**TABLE 2:** DEFINED OR ILLUSTRATIVE ACTIVITIES AND SUB-ACTIVITIES

<b>Activity 1</b> — Improve the conduct of key electoral operations for the 2020 Council of Representatives elections
Sub-activity 1.1: Capacity building for Governorate Electoral Offices (GEOs)
Sub-activity 1.2: Assistance in the formulation and implementation of election cascade training plans
Sub-activity 1.3: Support for the preparation and management of a Results Management System
Sub-activity 1.4: Support to IHEC in developing an electoral Code of Conduct for political actors

## 2.0 ENVIRONMENTAL ANALYSIS

### 2.1 JUSTIFICATION FOR CATEGORICAL EXCLUSION

The activities under the Support to Iraq's Electoral Processes-UNAMI are among the classes of actions listed in 22 CFR 216.2(c)(2) and have no foreseeable significant direct or indirect adverse effect on the environment. Therefore, under 22 CFR 216.2(c)(1), neither an IEE nor an EA will be required for these activities. Instead, a Categorical Exclusion is recommended for the activities described above in Section 1.3 as follows:

**TABLE 3:** RECOMMENDED DETERMINATION FOR CATEGORICAL EXCLUSION

Activity and Sub-Activity #	Recommended Determination for Categorical Exclusion
<b>Activity 2</b> — Improve the conduct of key electoral operations for the 2020 Council of Representatives elections	<p>§216.2(c)(2)(i) Education, technical assistance, or training programs except to the extent such programs include activities directly affecting the environment (such as construction of facilities, etc.)</p> <p>§216.2(c)(2)(iii) Analyses, studies, academic or research workshops and meetings</p> <p>§216.2(c)(2)(v) Document and information transfers</p>
Sub-activity 1.1: Capacity building for Governorate Electoral Offices (GEOs)	<p>§216.2(c)(2)(i) Education, technical assistance, or training programs except to the extent such programs include activities directly affecting the environment (such as construction of facilities, etc.)</p> <p>§216.2(c)(2)(iii) Analyses, studies, academic or research workshops and meetings</p> <p>§216.2(c)(2)(v) Document and information transfers</p>
Sub-activity 1.2: Assistance in the formulation and implementation of election cascade training plans	<p>§216.2(c)(2)(i) Education, technical assistance, or training programs except to the extent such programs include activities directly affecting the environment (such as construction of facilities, etc.)</p> <p>§216.2(c)(2)(iii) Analyses, studies, academic or research workshops and meetings</p> <p>§216.2(c)(2)(v) Document and information transfers</p>
Sub-activity 1.3: Support for the preparation and management of a Results Management System	<p>§216.2(c)(2)(i) Education, technical assistance, or training programs except to the extent such programs include activities directly affecting the environment (such as construction of facilities, etc.)</p> <p>§216.2(c)(2)(iii) Analyses, studies, academic or research workshops and meetings</p> <p>§216.2(c)(2)(v) Document and information transfers</p>

Sub-activity 1.4: Support to IHEC in developing an electoral Code of Conduct for Political Actors	<p>§216.2(c)(2)(i) Education, technical assistance, or training programs except to the extent such programs include activities directly affecting the environment (such as construction of facilities, etc.)</p> <p>§216.2(c)(2)(iii) Analyses, studies, academic or research workshops and meetings</p> <p>§216.2(c)(2)(v) Document and information transfers</p>
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## 2.2 CLIMATE RISK MANAGEMENT

The project design team, in consultation with the mission Climate Integration Lead (CIL), considered the potential effect of climate risks/stressors on the sustainability of the project (changing precipitation patterns, rising temperature, floods, droughts, fires, landslides, etc.) in addition to the impact of project activities on the climate (increased greenhouse gas emissions, land use changes, etc.). Considering these factors and the relatively short (3 year) duration and impact period for this activity, the climate risk was determined to be low for all sub-activities. Annex 1 summarizes the findings of the CRM Screening (see Annex 1).

## 3.0 LIMITATIONS OF THE CATEGORICAL EXCLUSION

The categorical exclusions recommended in this document apply only to activities and sub-activities described herein.

Other activities that may arise must be subject to an environmental analysis and the appropriate documentation prepared and approved, whether it be a new Request for Categorical Exclusion, an amendment, or other type of 22 CFR 216 document.

It is confirmed that the activities described herein do not involve actions normally having a significant effect on the environment, including those described in 22 CFR 216.2(d).

### 3.1 MANDATORY INCLUSION OF ENVIRONMENTAL COMPLIANCE REQUIREMENTS IN SOLICITATIONS, AWARDS, BUDGETS, AND WORK PLANS

USAID will ensure the environmental compliance requirements are incorporated into solicitations, awards, budgets, and work plans, including relevant limitations of Section 3 above. In addition, climate risk management requirements will also be incorporated.

### 3.2 GENERAL IMPLEMENTATION & MONITORING REQUIREMENTS (IF APPLICABLE)

USAID will ensure that the following requirements are met:

- Provide briefings for Implementing Partner (IP) on environmental compliance responsibilities
- Ensure integration of compliance responsibilities in prime and sub-awards and grant agreements;
- Ensure compliance with applicable partner country requirements
- The Implementing Partner must ensure compliance with all host government and USAID requirements for disease prevention and ensure its staff and volunteers receive appropriate and timely guidance and training on the latest mitigation measures to prevent the spread of COVID-19 and other infectious diseases. This includes, but is not limited to proper hygiene, use of masks and gloves, cleaning/disinfecting, and social distancing, as appropriate.

- Annual review of project activities to ensure that scope is still covered by Categorical Exclusion

## ATTACHMENTS:

Annex 1: Climate Risk Management Summary Table for Activity

ANNEX 1. **ACTIVITY** CLIMATE RISK MANAGEMENT SUMMARY TABLE

Tasks/Defined or Illustrative Interventions	Climate Risks <sup>2</sup>	Risk Rating <sup>3</sup>	How Risks are Addressed <sup>4</sup>	Opportunities to Strengthen Climate Resilience <sup>5</sup>
<b>Activity 1 —</b> Improve the conduct of key electoral operations for the 2020 Council of Representatives elections	Delays or disruptions in conducting activities due to extreme weather events.	Low Risk	As possible, utilize buildings with climate resilient designs, that reduce exposure to uncomfortable or unsafe high temperatures	As possible, utilize buildings with climate resilient designs that reduce exposure to uncomfortable or unsafe high temperatures.
Sub-activity 1.1: Capacity building for Governorate Electoral Offices (GEOs)	Delays or disruptions in conducting activities due to extreme weather events.	Low Risk	As possible, utilize buildings with climate resilient designs, that reduce exposure to uncomfortable or unsafe high temperatures	Monitor weather patterns and align service delivery with time periods least prone to particularly high temperatures, or extreme weather events.
Sub-activity 1.2: Assistance in the formulation and implementation of election cascade training plans	Delays or disruptions in conducting activities due to extreme weather events.	Low Risk	As possible, utilize buildings with climate resilient designs, that reduce exposure to uncomfortable or unsafe high temperatures	
Sub-activity 1.3: Support for the preparation and management of a Results Management System	Delays or disruptions in conducting activities due to extreme weather events.	Low Risk	As possible, utilize buildings with climate resilient designs, that reduce exposure to uncomfortable or unsafe high temperatures	
Sub-activity 1.4: Support to IHEC in developing an electoral Code of Conduct for Political Actors	Delays or disruptions in conducting activities due to extreme weather events.	Low Risk	As possible, utilize buildings with climate resilient designs, that reduce exposure to uncomfortable or unsafe high temperatures	

<sup>2</sup> List key risks related to the defined/illustrative interventions identified in the screening and additional assessment.

<sup>3</sup> Low/Moderate/ High

<sup>4</sup> Describe how risks have been addressed in activity design and/or additional steps that will be taken in implementation. If you chose to accept the risk, briefly explain why.

<sup>5</sup> Describe opportunities to achieve multiple development objectives by integrating climate resilience or mitigation measures